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Attorneys for Healthcare Conglomerate Associates, LLC and
Vi Healthcare Finance, Inc.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

In re:

SOUTHERN INYO HEALTHCARE
DISTRICT,

Debtor.

Case No.: 16-10015-A-9

Chapter 9

DC No.: KDG-5

Date: December 19, 2018
Time: 1:30 p.m.
Place: United States Bankruptcy Court
2500 Tulare Street, Fifth Floor
Department A, Courtroom 11
Fresno, California
Judge: Honorable Fredrick E. Clement

SUPPLEMENTAL DECLARATION OF HAGOP T. BEDOYAN IN SUPPORT OF
MOTION TO QUASH SUBPOENA TO BAKER HOSTETLER LLP

1 I, the undersigned, hereby declare as follows:

2 I am licensed to practice law in California. I am admitted to practice before the United
3 States District Court of the Eastern District of California and I am a partner in the law firm
4 Klein, DeNatale, Goldner, Cooper, Rosenlieb & Kimball, LLP ("KDG"). KDG is counsel of
5 record for Healthcare Conglomerate Associates, LLC ("HCCA") and VI Healthcare Finance,
6 Inc., ("Vi"), creditors in the above-referenced Chapter 9 case, and also counsel to Medflow, PC
7 and Tulare Asset Management in relation to this Motion to Quash the Subpoena to Baker
8 Hostetler, LLP (the "Motion to Quash"). I have personal knowledge of the matters stated in
9 this declaration. If the Court or a party called on me to do so, I could and would competently
10 testify to these facts under oath. I have been certified as a specialist in Bankruptcy by the
11 California State Bar's Board of Legal Specialization since 1995. I submit this supplemental
12 declaration in support of the Motion to Quash.

13 1. On November 14, 2018, I attended the Status Conference in this matter relating
14 to the Motion to Quash as well as the pending Motion to Disqualify Foley & Lardner and
15 Ashley McDow (the "DQ Motion"). At this Conference, your Honor ordered that Debtor's
16 opposition to the Motion to Quash would be due on December 5, 2018 and the Reply in
17 Support of the Motion to Quash would be due on December 12, 2018. The Court also ordered
18 that each party should submit a separate brief due on the same day as the Opposition and the
19 Reply, respectively, addressing: (1) which old and new Rules of Professional Conduct ("RPC")
20 are applicable, (2) whether there are differences in the applicable old and new RPC, and (3) if
21 there are differences, whether the new RPC apply retroactively.

22 2. I did not receive a copy of the Objection to the Motion to Quash on December 5,
23 2018. The first I learned that the Objection was filed was when I received an ECF notification
24 at approximately 3:30 p.m. notifying me that the Objection had been filed at 1:36 a.m. on
25 December 6, 2018 and had been docketed by the Court at 11:22 a.m. on December 6, 2018.

26 3. [Dkt No. 529]. To date, I have never received an e-mail with a PDF attachment
27 of the Objection as required by Local Rule 7005-1(d).
28

I declare under penalty of perjury that the foregoing statements are true and correct and that if called as a witness herein I could and would competently testify thereto, and that this declaration was executed on December 12, 2018 at Fresno, California.

HAGOP T. BEDOYAN